

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

JAN SCHECHTER, on behalf of )  
himself and all others similarly situated, )

Plaintiffs, )

v. )

HYUNDAI MOTOR AMERICA and )  
HYUNDAI MOTOR COMPANY, )

Defendants. )

\_\_\_\_\_ )

**No. 3:18-cv-13634-FLW-DEA**

Return Date: February 4, 2019  
Oral Argument Requested

**CERTIFICATION OF JEREMY H. ERSHOW**

I, Jeremy H. Ershow, respectfully certify as follows:

1. I am an attorney at the law firm Jenner & Block LLP, counsel for Defendants Hyundai Motor America (“HMA”) and Hyundai Motor Company (“HMC”) (collectively, “Hyundai”) in the above-referenced action. I submit this certification in support of Hyundai’s Motion to Dismiss Plaintiff Jan Schechter’s Complaint. Unless otherwise stated, I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would competently testify thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of HMA’s 2016 Owner’s Handbook & Warranty Information, which covers all vehicles of that model year.

3. Attached hereto as **Exhibit B** is a true and correct copy of HMA’s 2017 Owner’s Handbook & Warranty Information, which covers all vehicles of that model year, including the 2017 2.4 Liter non-Turbocharged Hyundai Santa Fe Sport.

4. Attached hereto as **Exhibit C** is a true and correct copy of the Order on Motion to Dismiss in *Sanborn v. Nissan North America, Inc.*, No. 14-cv-62567-KMM (S.D. Fl. Nov. 11, 2014).

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 14th day of December 2018, in New York, New York.

/s/ *Jeremy H. Ershow*

Jeremy H. Ershow